

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

VALENTIA COLEMAN

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§

Case Number 5:17-cv-00819-FB

Vs.

§

§

**SECETARY OF THE DEPARTMENT OF
THE AIR FORCE, HEATHER WILSON**

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§

**UNOPPOSED MOTION FOR LEAVE TO FILE PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT ON JULY 12, 2020**

NOW COMES the Plaintiff, VALENTIA COLEMAN, by and through her attorney of record, and files this Unopposed Motion for Leave to file Plaintiff's Motion for Summary Judgment on July 12, 2020.

Because of a calendaring error and other unique events that have hampered efficiency, Plaintiff requests the court for permission to file its Motion for Summary Judgment on Sunday, July 12, 2020, two (2) days after the Friday, July 10, 2020 deadline.

1. The undersigned acknowledges that his failure to file a timely motion was his error.
2. The undersigned is filing the instant Motion in an attempt to correct his error.
3. There was no bad faith intended by the late filing.
4. The undersigned does not believe that Defendant was prejudiced by the July 12, 2020 filing, two (2) days after the deadline.
5. On July 28, 2020, the Court extended the parties' time to file a response to the respective motions for summary judgment by 14 days.
6. Defendant's counsel does not oppose this Motion.


7. This Motion is made in good faith and not for purposes of delay, but rather for justice to be done.

WHEREFORE, Plaintiff respectfully requests that this Court enter an Order granting Plaintiff leave to late file her Motion for Summary Judgment.

Certificate of Counsel

The undersigned conferred with Defendant's counsel and he does not oppose this Motion.

Respectfully Submitted,

By: 
Ricardo A. Garcia-Tagle
Bar Number 24025375
315 S. St. Mary's Street
San Antonio, TX 78205
210.444.1599 (T)
210.855.6098(Fax)
Ricardo@ragarcialaw.com
ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on July 29, 2020, I electronically filed the foregoing document with the Clerk of the United States District Court, Western District of Texas, San Antonio Division, using the electronic case filing system of the Court with service to the following:

Dingivan, James, Assistant United States Attorney

james.dingivan@usdoj.gov


Ricardo A. Garcia-Tagle